

## CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America v. <b>Daniel Blas-Torrealba</b> DOB: 2000; United States	DOCKET NO.  MAGISTRATE'S CASE NO.  <b>20-01500 MJ</b>
Complaint for violation of Title 8 United States Code § 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i), and 1324(a)(1)(B)(iii)	
<b>COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:</b> On or about January 23, 2020, in the District of Arizona, <b>Daniel Blas-Torrealba</b> , knowing and in reckless disregard of the fact that certain illegal aliens, Leobardo Cristobal-Santos and Henry Gustavo Chabla-Carchi, had come to, entered and remained in the United States in violation of law, did transport and move said aliens within the United States by means of transportation and otherwise, in furtherance of such violation of law and did so for the purpose of private financial gain, and placing in jeopardy the life of any person; in violation of <b>Title 8, United States Code, Sections 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii).</b>	
<b>BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:</b> On or about January 23, 2020, near Whetstone, in the District of Arizona, United States Border Patrol Agents (BPA) encountered a blue 2018 Nissan Versa at the SR-90 immigration checkpoint with two visible occupants. The driver was identified as <b>Daniel Blas-Torrealba</b> and a female juvenile passenger, both U.S. Citizens. The vehicle was referred to secondary inspection after a service dog alerted to the trunk. At secondary inspection, BPA found two illegal aliens hiding in the trunk.  Material witnesses Leobardo Cristobal-Santos and Henry Gustavo Chabla-Carchi stated that they had made arrangements to be smuggled into the United States for money. Both stated that they crossed the border illegally. Cristobal said that he crossed alone and that the smugglers gave him directions to the load up spot. Cristobal said that a blue four door sedan arrived with a male driver and young female passenger. He said that the driver told him to get inside the trunk. Cristobal said that they stopped and picked up another person, he got into the trunk also. Then, the driver stopped at a gas station for about 10 minutes before they were arrested by BPA. Chabla said that he was picked up by the blue four door sedan at the hotel that he stayed at after he crossed the border. The driver told him to get inside the trunk and there was another male already inside the trunk.	
MATERIAL WITNESSES IN RELATION TO THE CHARGE: Leobardo Cristobal-Santos and Henry Gustavo Chabla-Carchi	
Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge. AUTHORIZED BY: AUSA JAA/ri <i>[Signature]</i>	SIGNATURE OF COMPLAINANT <i>[Signature]</i> OFFICIAL TITLE Border Patrol Agent
Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE JUDGE <sup>1)</sup> <i>[Signature]</i>	DATE January 24, 2020

1) See Federal rules of Criminal Procedure Rules 3 and 54